

Clerk's Office  
FILED  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2007 OCT - 1 AM 10:45IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al., )  
Plaintiffs, )  
v. ) Civil Action No. 05-823-\*\*\* (MPT)  
STANLEY TAYLOR, et al., )  
Defendants. )

## CERTIFICATION

At Wilmington this *1st* day of October, 2007;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on September 25, 2007, do hereby certify that:

1. The deposition of Chris Senato was held on September 25, 2007, at the J. Caleb Boggs Federal Building, Wilmington, Delaware.
2. On that same date, Chris Senato declared before me, an individual authorized to administer oaths, that his written answers were true and correct.
3. I read aloud each and every deposition question submitted by plaintiff, George A. Jackson, for deponent, Chris Senato.
4. I personally observed deponent, Chris Senato, answer in writing, the deposition questions.
5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties

and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.

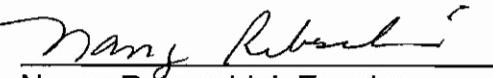
Executed this 1<sup>st</sup> day of October, 2007.

  
\_\_\_\_\_  
Nancy Rebeschini, Esquire, Designated  
Officer

CERTIFICATE OF SERVICE

I hereby certify that on October / , 2007, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Eileen Kelly, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiffs: George A. Jackson, SBI No. 171250, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darus Young, SBI No. 282852, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles Blizzard, SBI No. 166670, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Frank Williams, SBI No. 261867, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roy R. Williamson, SBI No. 291856, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Anthony Morris, SBI No. 300363, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Carl Walker, SBI No. 173378, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Samuel Jones, SBI No. 465297, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darwin A. Savage, SBI No. 232561, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Adrain Wright, SBI NO. 169921, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Gilbert Williams, SBI No. 137575, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles B. Sanders, SBI No. 160428, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Joseph White, SBI No. 082985, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Timothy L. Malloy, SBI No. 171278, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Howard Parker,

SBI No. 165324, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Kevin Spivey, SBI No. 258693, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; James Johnson, SBI No. 155123, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Vernon Truitt, SBI No. 188191, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roderick Brown, SBI No. 315954, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; José Serpa, SBI No. 350322, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roger Thomas, SBI No. 292590, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; John F. Davis, SBI No. 263753, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Lawrence B. Dickens, SBI No. 124570, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Eldon Potts, SBI No. 211193, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Jerome Green, SBI No. 147772, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; and Rique Reynolds, SBI No. 266486, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947.



Nancy Rebeschini  
Nancy Rebeschini, Esquire,  
Designated Officer

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF DELAWARE

260

GEORGE A. JACKSON, et al.,

:

Plaintiffs,

:

v.

C.A. No. 05-823-\*\*\*

STANLEY TAYLOR, et al.,

:

JURY TRIAL REQUESTED

Defendants.

:

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS  
TO DEPOSE DEFENDANT CHRIS SENATO

Plaintiff George A. Jackson, pro se, hereby depose defendant upon  
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the extent of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of Corrections?

2. Are you under the influence of any medication?

3. Have you had a chance to meet and discuss the case with defendants' counsel?

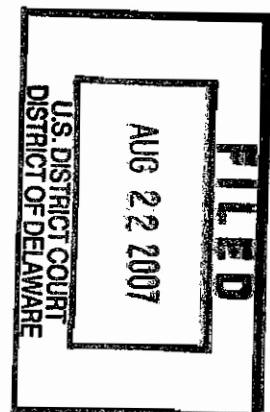
4. Have you had a chance to review the Amended Complaint, your "Response to Plaintiffs' Interrogatories", and any previous statements you given to defendants' counsel or any one else in connection with this case before coming here today?

5. Do you realize that you are under oath, just as if you were at trial testifying.

6. Is there any reason you can't give your best testimony today?

7. Since the filing of the institutional grievance and lawsuit, by the named Plaintiffs, have the condition in the kitchen improved.

8. Does SCI main kitchen unit maintains certification records of all food service inspection, containing the name of the person who performed



the inspection and serial number, or other identifier of kitchen equipment?

9. Have you personally recorded the air temperature on the "old" side of the kitchen area, and compared to the "new" side area of the SCI main kitchen? If so, what was the results.

10. What is the SCI inmate work policy or procedure in place at the SCI kitchen, to handle complaint by inmates workers who believe there is an imminent danger at the work place?

11. Do you agree or disagree? When a person is working under a condition that exhibits excessive heat and high humidity, a persons body works at a much higher stress level due to the lack of oxygen in the air.

12. When inmate kitchen workers was housed in the air condition cool Merit buiding, if they refused to work or get fire, would that inmate received a major disciplinary report (class I), and immediately moved to a less disirable building?

13. In your "Response no. 4 to Plaintiffs' Interrogatories", you alleged that, "An outside contractor, Going Clean, steam cleans the hood systems. Did Going Clean ever steam clean the SCI main kitchen hood system prior to August 9, 2002?

14.. In your "Response no. 2 to Plaintiffs' Interrogatories", you alleged "there have been no recorded medical illnesses or incidents of dehydration from an inmate worker in the SCI kitchen." When an inmate complain of any illness, does the SCI food service staff diagnose the inmate, or is he refer to the medical unit to be examined by the proper authorized personnel?

15. During the summer when temperature rise and/or exceed 100 degree, inmates are instructed to drink plenty of liquids on these days. Are you aware there is only one (1) toilet seat for 22 to 25 inmate workers to use which forces workers to wait long periods, or even relieve themselves in floor drains?

Christopher Senate

9/25/07

1. Approximately 10 years.
2. No.
3. Yes.
4. Yes.
5. Yes.
6. No.
7. General conditions are the same.
8. No.
9. I have never personally recorded air temperature in SCI Kitchen.
10. Inmate workers can either complain to staff, verbally or in writing, or file an institutional grievance.
11. I don't understand the statement.
12. I don't know.
13. Not that I am aware <sup>of</sup> of.
14. Staff refers inmate workers to Medical.
15. There is 1 toilet seat in SCI Kitchen.

Christopher Senate

Christopher Senato

9/25/07

Eileen Kelly, Esq., DAG

3. Objection.

4. Objection.

13. Objection. Witness not provided with interrogatories and hasn't seen question.

14. Objection. Witness not provided with interrogatories and hasn't seen question.

15. Objection.

Eileen Kelly, DAG 9/25/07